

REMARKS/ARGUMENTS

Claims 1, 13 and 23 are currently amended, and claims 8, 9, 12, 14, 16 and 18-21 are hereby canceled, thereby leaving claims 2, 4-7, 10, 11, 15 and 17 unchanged. Claims 2, 6, 11-13, 15-17, 19 and 21 were previously withdrawn and claims 3 and 22 were previously canceled.

Claims 1, 4, 5, 7-10, 14, 18 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Publication No. WO 01/61133 (Hager) in view of US 6,422,755 (Cadle).

As agreed by the Examiner, Hager does not teach the receptacles embodied as centering holes for corresponding centering pins arranged on the second housing part and the second housing part featuring counter receptacles for the connecting elements surrounded at least partially by the centering pins. Hager further does not disclose that the centering pin forms a clearance fit together with the centering holes.

Cadle discloses a connection between a reciprocating engine rod 620 and a bearing cap 622, see Figs. 30a and 30b. The connection includes integral dowels 630, 632 and counterbores 634, 636. A fastener is inserted into drilled and threaded holes 638 to secure the reciprocating engine rod 620 to the bearing cap 622. However, Cadle discloses a method of ensuring that the reciprocating engine rod 620 and the bearing cap 622 can be re-aligned properly. The reciprocating engine rod 620 and the bearing cap 622 are connected and the integral dowels 630, 632 are deformed, and then a bore 624, 626 is drilled. The reciprocating engine rod 620 and the bearing cap 622 are separated, a crankshaft is installed, and the reciprocating engine rod 620 and the bearing cap 622 are re-connected. The deformed integral dowels 630, 632 assure that the reciprocating engine rod 620 and the bearing cap 622 are accurately re-positioned.

Cadle does not teach or suggest, among other things, a drive unit for actuating drives in a motor vehicle with a first housing part, and a second housing part, which is connected to the first housing part by means of connecting elements, wherein the first housing part features receptacles for the connecting elements, characterized in that the receptacles are embodied as centering holes for corresponding centering pins, which are arranged on the second housing part, characterized in that the second housing part features counter receptacles for the connecting elements, which are surrounded at least partially by the centering pins.

Rather, Cadle discloses that the reciprocating engine rod 620 and the bearing cap 622 are connected such that the integral dowels 630, 632 are deformed, and then a bore 624, 626 is

drilled. The reciprocating engine rod 620 and the bearing cap 622 are separated, a crankshaft is installed, and the reciprocating engine rod 620 and the bearing cap 622 are re-connected. The deformed integral dowels 630, 632 assure that the reciprocating engine rod 620 and the bearing cap 622 are accurately re-positioned.

The combination of Hager and Cadle does not meet the claim limitations of claims 1 and 23. Specifically, one or ordinary skill in the art would not look to the method of assuring accurate re-alignment of the reciprocating engine rod 620 and the bearing cap 622 of Cadle when designing the motor housing of Hager and conclude that Hager should be modified to include centering pins. Such a combination is based upon improper hindsight reasoning.

Cadle further does not teach or suggest that the centering pin forms a clearance fit together with the centering holes. Rather, Cadle discloses deforming integral dowels 630, 632 with the counterbores 634, 636, which is inherently not a clearance fit.

Cadle further does not teach or suggest that the first housing part is a pole pot of an electric motor and the second housing part is a gear housing, or that a brush holder is arranged between the first housing part and the second housing part. Rather, Cadle discloses a connection between a reciprocating engine rod 620 and a bearing cap 622 defining a bore 624, 626 therebetween.

For at least these reasons, Hager and Cadle, either alone or in combination, do not teach or suggest each and every element of claims 1 and 23. Claims 2, 4-7, 10, 11, 13, 15, 17 depend from claim 1 and are additionally allowable for these and other reasons not specifically discussed herein. Withdrawal of the rejection and allowance of claims 1, 2, 4-7, 10, 11, 13, 15, 17 and 23 is respectfully requested. If additional consultation will further prosecution, the undersigned is available during normal business hours at the below-identified telephone number.

Claims 1, 4, 7, 9, 10, 18 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over US 4,987,791 (Nakahashi) in view of US 4,156,821 (Kurome).

Nakahashi discloses a connection between a motor portion 1 and a reduction gear portion 2 that includes bolts extending through holes in flanges on motor portion 1 and reduction gear portion 2. As agreed by the Examiner, Nakahashi does not teach the corresponding centering pins arranged on the second housing part and the counter receptacles surrounded at least partially

by the centering pins. Nakahashi further does not disclose that the centering pin forms a clearance fit together with the centering holes.

Kurome discloses a connection in which a stator core F is retained between two bracket members H', H'', see Figs. 8 and 9. The stator core F includes bolt apertures R that receive cylindrical portions Cy at each end. A bolt Bo is inserted into each of the bolt apertures R to secure the bracket members H', H'' to the stator core F. The cylindrical portions Cy properly position the stator core F between the bracket members H', H'', see col. 9, lines 17-27.

Kurome does not teach or suggest, among other things, a drive unit for actuating drives in a motor vehicle with a first housing part, and a second housing part, which is connected to the first housing part by means of connecting elements, wherein the first housing part features receptacles for the connecting elements, characterized in that the receptacles are embodied as centering holes for corresponding centering pins, which are arranged on the second housing part, characterized in that the second housing part features counter receptacles for the connecting elements, which are surrounded at least partially by the centering pins.

Rather, Kurome discloses a stator core F held between two bracket members H' and H''. The bracket members H' and H'' have respective cylindrical portions Cy at each end that extend into bolt apertures R of the stator core F. Bolts Bo are inserted into the cylindrical portions Cy and the bolt apertures R to fix the bracket members H', H'' to the stator core F.

The combination of Nakahashi and Kurome does not meet the claim limitations of claims 1 and 23. Specifically, one of ordinary skill in the art would not look to the connection between bracket members and the stator core of Nakahashi when designing the motor housing of Nakahashi and conclude that Nakahashi should be modified to include centering pins. Such a combination is based upon improper hindsight reasoning.

Kurome further does not teach or suggest, that the centering pin forms a clearance fit together with the centering holes. Rather, Kurome discloses inserting cylindrical portions Cy on bracket members H', H'' into bolt apertures R of the stator core F to fix the stator core F between the bracket members H', H''. Bolts Bo are then inserted into the bolt apertures R to fix the stator core F to the bracket members H', H''. Neither the connection between the cylindrical portions Cy and the bolt apertures R, nor the connection between the cylindrical portions Cy and the bolts

Bo is a clearance fit, but rather, the connections are a tight fit to prevent mis-alignment during operation.

Nakahashi further does not teach or suggest that the first housing part is a pole pot of an electric motor and the second housing part is a gear housing, or that a brush holder is arranged between the first housing part and the second housing part. Rather, Nakahashi discloses a connection between bracket members H', H" and a stator core F.

For at least these reasons, Nakahashi and Kurome, either alone or in combination, do not teach or suggest each and every element of claims 1 and 23. Claims 2, 4-7, 10, 11, 13, 15, 17 depend from claim 1 and are additionally allowable for these and other reasons not specifically discussed herein. Withdrawal of the rejection and allowance of claims 1, 2, 4-7, 10, 11, 13, 15, 17 and 23 is respectfully requested.

If additional consultation will further prosecution, the undersigned is available during normal business hours at the below-identified telephone number.

Respectfully submitted,

/julianne m. cozad smith/

Julianne M. Cozad Smith
Reg. No. 62,174

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Michael Best & Friedrich LLP
100 East Wisconsin Avenue
Suite 3300
Milwaukee, Wisconsin 53202-4108
414.271.6560